

EXHIBIT B

DECLARATION OF ROBERT A. RICH

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Zraick, Jr., Nancy Zraick, Patricia
DeLuca and Karen M. Rich*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard
L. Madoff Investment Securities LLC,

Plaintiff,
v.

Edward A. Zraick, Jr., individually and as joint tenant;
Nancy Zraick, individually and as joint tenant; Patricia
Zraick DeLuca, individually and as joint tenant; Karen M.
Rich, individually and as joint tenant; Estate of Lorraine
Zraick; Edward A. Zraick, Jr., as personal representative of
the Estate of Lorraine Zraick; and Patricia Zraick DeLuca, as
personal representative of the Estate of Lorraine Zraick,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05257 (SMB)

**DECLARATION OF ROBERT A. RICH IN SUPPORT OF
ZRAICK DEFENDANTS' MOTION TO SHORTEN NOTICE
AND FOR EXPEDITED HEARING ON MOTION
FOR ENTRY OF AN ORDER (A) CLARIFYING THAT DEFENDANTS
MAY COMMUNICATE WITH THEIR FINANCIAL INSTITUTIONS; AND
(B) DESIGNATING ANY BANK RECORDS PRODUCED IN
RESPONSE TO THE TRUSTEE'S SUBPOENAS AS CONFIDENTIAL**

I, Robert A. Rich, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate with the law firm of Hunton & Williams LLP, counsel for Defendants Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca, and Karen Rich (collectively, the “Defendants”) in the above-captioned action.

2. I submit this declaration on personal knowledge in support of the *Zraick Defendants' Motion to Shorten Notice and for Expedited Hearing on the Motion for Entry of an Order (A) Clarifying that Defendants may Communicate with their Financial Institutions, and (B) Designating any Bank Records Produced in Response to the Trustee's Subpoenas as Confidential* (the “Motion”).¹ A true and complete copy of the proposed order granting the Motion is annexed as Exhibit A to the Motion.

3. Rule 9077-1(b) provides that no *ex parte* order in a contested matter shall be granted except upon a clear and specific showing by affidavit or motion showing cause for the *ex parte* action as well as cause for the relief requested. Here, there is ample cause.

4. The Trustee has threatened Defendants with contempt action should Defendants communicate with their Banks in connection with the Subpoenas. Through the Motion for Protective Order, Defendants seek clarification that no prior orders of this Court prohibit their communication with the Banks in connection with the Subpoenas, and that the Trustee's threats are baseless.

¹ Capitalized terms not defined herein shall have the meanings ascribed to such terms in the Motion.

5 The Trustee has indicated that he already served the Subpoenas. Accordingly, if the Motion for Protective Order is heard on normal 14 days' notice, the Trustee already may have obtained access to the Personal Financial Information, rendering the requested relief ineffective. Accordingly, sufficient cause exists for an expedited hearing and to shorten the notice period with respect to the Motion for Protective Order.

6. No previous request for the relief sought in the Motion has been made to this Court or any other court.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on April 18, 2016

/s/ Robert A. Rich

Robert A. Rich